

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

----- DIVISION

FILED
SEP 11 2023
PETER A. MOORE JR., CLERK
US DISTRICT COURT, EDNC
BY AAA DEP CLK

Tammy Gallop Sharp)
-----)
-----)

(Enter above the full name
of the Plaintiff[s] in this
action).

vs.

City of Elizabeth City)
clo Montre Freeman)
City Manager)
-----)

(Enter above the full name of
ALL Defendant[s] in this action.
Fed.R.Civ.P.10(a) requires that
the caption of the complaint
include the names of **all** the
parties. Merely listing one
party and "et al." is insufficient.
Please attach additional sheets if
necessary).

Case No.

2:23-cv-52-FL

(To be assigned
by the Clerk of
District Court)

COMPLAINT

Plaintiff resides at:

270 Shadneck Rd Elizabeth City
NC 27909

Defendant(s) name(s) and address(es), if known:

City of Elizabeth City
clo Montre Freeman City Manager

Jurisdiction in this court is based on: _____

The acts complained of in this suit concern: _____

The City of Elizabeth City violated my rights under Article I, Section I of the North Carolina Constitution which states "We hold it to be self-evident that all persons are created equal; that they are endowed by their Creator with certain inalienable rights; that among these are life, liberty, the enjoyment of the fruits of their own labor, and the pursuit of happiness." By denying me promotions, title changes and raises for over seven years with no explanation given the City violated its own policy. By Personnel Policy Manual 3.0 Merit Principles Eligible employees shall receive merit pay increases based on the quality of their performance, subject to the availability of funds which clearly shows that there was money in the Electric budget for me. But the City of EC chose to create

an illegal position of Project Manager for Randy Lassiter. This position was not approved by City Council. This position also resulted in "alleged" payroll fraud. By Personnel Policy V. Personnel Actions 3.0 Promotions when the promotional qualification of two(2) or more employees are judged to be equal, the employee with the longest service with the City shall be promoted. I have more years of service than Randy Lassiter and more years of service than Ro. By the gross abuse of authority by the City of Elizabeth and City managers they have deprive me "the fruits of my labor."

(If you need more space, or wish to include any further information for consideration, please attach additional sheets.)

I seek the following relief:

My back pay $\$512,486 \times 2 = \$1,024,972$ and benefit, punitive damages to the total insurance policy limit for my pain and suffering, Also Attorney fees.

9/11/23

Date

Sammy Gallop Sharp

Signature of Plaintiff

Address and Telephone Number of Plaintiff